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# INGRAM BARGE COMPANY

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May 2, 2001

Docket Management Facility  
U. S. Department of Transportation  
Room PL-401  
400 Seventh Street, S. W.  
Washington, D. C. 20590-001

Subj: Fire Suppression Systems and Voyage  
Planning for Towing Vessels  
Docket # USCG 2000-6931-42

DEPT. OF TRANSPORTATION  
DOCKETS  
01 MAY -3 AM 9:44

Dear Sir or Madam:

Today, Ingram Barge Company owns a fleet of 62 towboats, and has been in the towboat operating business for over 50 years throughout the inland river system. We oppose the proposed requirement for fixed fire-extinguishing systems on inland towing vessels and also oppose the proposed requirements for voyage planning.

In our years of operating inland vessels, we have never experienced an incapacitating engine room fire. However, we believe the new fire detection regulations, which are currently being implemented on our vessels, will provide additional protection by means of early warning and preparation to respond to a fire. In this situation portable fire extinguishers provide the best means of response without incapacitating the vessel. This has been the method used to extinguish the small number of engine room fires we have experienced. In fact, we have never used the fixed fire suppression systems we currently have among the vessels in the Ingram fleet.

The proposed requirements for voyage planning are prepared for a trip with a discrete origin and destination. Most voyages on the inland rivers are continuous in nature with frequent stops to drop or pickup barges. The proposed voyage planning regulations are not structured for the inland river operating environment. As a matter of good operating practice, inland mariners take into account the relevant parameters of navigating the rivers. There is no benefit to formalizing this process. In fact, our captains and pilots have a formalized checklist that is used each watch change.

Thank you for the opportunity to comment on this rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Sehr', with a long horizontal stroke extending to the right.

David G. Sehr  
Vice President  
Operations and Engineering